

MM 98-004

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Comments in the matter of:

FCC EEO Hearing

Comments of EEO Supporter:

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Good morning and thank you for this opportunity to participate in this hearing. As stated, I am Charles M. Warfield, Jr. and I'm the President and Chief Operating Officer of ICBC Broadcast Holdings, Inc. a subsidiary of Inner City Broadcasting Corporation in New York City. Our company is the second largest Black owned and operated radio company in America.

My broadcast career covers twenty-five (25) years beginning in 1977. Inner City Broadcasting Corporation hired me, as its first Controller. The Company and its founding family members, Percy and Pierre Sutton, provided me an opportunity to learn the radio business and the opportunity to advance to the position of Vice President / General Manager of its flagship stations, WBLS-FM and WLIB-AM in New York City.

At that time there were three African-American general managers in New York City radio and Black owners employed two of us. In the past twenty years in New York City,

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there have not been more than two African-American general managers and at all times they have been employed by Black owners.

Since my initial tenure with Inner City Broadcasting Corporation, I've held senior management positions with Summit Broadcasting Corporation as Vice President / General Manager of WRKS-FM in New York City and Sr. Vice President and Regional Manager for AMFM Radio with responsibility for management oversight for a thirty (30) radio stations cluster.

In these two companies I was the most senior African-American employee. In both companies, senior management was responsible for, committed to and involved in efforts to identify, recruit and hire employees from diverse ethnic backgrounds. While this effort was ongoing, we were continually challenged to identify suitable candidates due to a shortage of very high quality job applicants, that is, people with extraordinary creativity, long-term dedication to and passion for broadcasting as a profession, not just a career.

There are a number of reasons for this difficulty. First, broadcasting is not all that highly regarded in the minds of young people making their career decisions. A highly motivated person wants to rise to the top, but when a young minority person considering whether to pursue radio or some other career looks at the top of our profession, he doesn't see a lot of people who look like him or her -- except at minority owned stations. As reported by the Minority Media and Telecommunications Council, just over half of the minorities in

radio work for minority owned stations. Minorities only own 4.2% of the radio stations; thus, minority owned stations simply don't have enough top positions to which young people coming into the industry can aspire to fill.

The record of this proceeding includes extensive evidence of the gross under deployment of minorities and women, and underutilization of their talent in our industry. For example:

---- EEOC data for 2000 discloses that for broadcasters with over 100 employees, minorities were only 15.4% of officials and managers and 15.7% of sales workers.

Women were only 17.6% of the technicians.

---- The Radio and Television News Directors Association (RTNDA) has found that between 1994 and 2001, the percentage of minorities among radio journalists declined from 14.7% to 10.7%, and the percentage of minorities among radio news directors declined from 8.6% to 4.4%. Most of the few minority news directors were at Spanish language or minority owned stations.

And from my own experience, in 1997 at a meeting of corporate executives and general managers of a 96 station group, there were only six (6) African-Americans in attendance. We represented 6% of the general managers in attendance and today as a result of consolidation, only three (3) of us are employed in the broadcast industry.

A second reason we have difficulty attracting talent is that too many companies disregard their obligations to provide equal opportunity. I am not talking about intentional

discrimination, although there's no question that there's a lot of that too. I'm talking about broadcast stations that simply do the bare minimum, or nothing at all, to show that they care at all about bringing persons historically excluded from our profession into the fold.

When the EEO rule was originally adopted in 1969, the Commission said that the best hope for equal opportunity was the voluntary efforts of broadcasters to do training and mentoring -- efforts that should be taken above and beyond the bare minimum requirements of the rules. That's still true today; however, most of today's broadcast managers were kids in 1969, or weren't even born then, so they don't remember the tradition of public service that we broadcasters once took for granted.

A young person trying to decide what to do with his life will go where he thinks he will have a fair chance to compete. Thus, a decision by the FCC to lift the suspension of the EEO rules will go a long way toward reassuring our young people that the broadcasting industry offers them real opportunity.

The rules you have proposed remind me of the days of voluntary public service a generation ago...when most of today's participants got their start in the industry. One of your proposals is that we pick four means of outreach from a list of thirteen. I would suggest that you emphasize that broadcasters should not just pick four means of outreach -- they should pick **at least** four. And top management should be responsible for and involved in the implementation of these efforts. Look at some of what's on the list:

- Job fairs

- Mentoring programs
- Internship programs
- Participation in job banks
- Scholarships
- Speaking to groups of young people about broadcast careers.

Our industry should be doing all of these things!

There are a few additional steps you could add to your list of thirteen options:

- First, you might encourage broadcasters to work with minority and women's groups to help them develop training programs and mentoring and job referral programs targeted to broadcasting. Too many of us criticize the community groups for not sending over enough job candidates. Give these community groups some help and that would change.

- Second, you might encourage broadcasters to do their own in-house training on EEO, so that junior broadcast managers will acquire a conscious understanding of how to provide equal opportunity.

- Third, you should encourage broadcasters to participate in joint, industry wide programs that provide training and educational opportunities for minorities in our business. Two such programs that deserve special mention are the Walter Kaitz Foundation and the Emma Bowen Foundation for Minority Interests in Media. These pro-active initiatives need to grow, and we need more like them.

EEO isn't something our industry should be cheap about. It is our legacy, and this is the least of what we have to do to maintain our industry's competitiveness and our stature as the highest quality radio industry in the world, one that broadcasters in every other country emulate and wish they could enjoy.

Thank you for this opportunity to appear here today, and thank you for your concern and farsightedness in convening today's hearing.